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NOVEMBER 19, 1996

KVTV 13

A CBS AFFILIATE

LAREDO, TEXAS 78044

P. O. Box 2039 / Phone (512) 723 - 2923

FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET N.W.
WASHINGTON, D. C. 20554

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IN THE MATTER OF: ADVANCED TELEVISION
SYSTEMS AND THEIR IMPACT UPON THE
EXISTING TELEVISION BROADCAST SERVICE

RESPONDING TO MM DOCKET #87-268 COMMENTS ON THE SIXTH NOTICE OF PROPOSED RULEMAKING, K-SIX TELEVISION, INC., LICENSEE OF KVTV, CHANNEL 13, LAREDO, TEXAS, REQUESTS A CHANGE OF THE CURRENT CHANNEL 54 ADVANCED TELEVISION ALLOCATION AND ASSIGNMENT TO ATV CHANNEL 16. THE REQUESTED ASSIGNMENT TO ATV CHANNEL 16 IS SUPPORTED BY THE ATTACHED ENGINEERING STATEMENT MADE BY MATTHEW A. SANDERFORD, JR., P.E.

AMONG OTHER THINGS, LAREDO IS SERVED BY ONLY TWO VHF CHANNELS. KVTV'S 1,035 FOOT TOWER, WHICH IS LOCATED ON THE BANKS OF THE RIO GRANDE RIVER, REACHES FAR DOWN INTO MEXICO.

"LOS DOS LAREDOS" ARE CIVICALLY AND LINGUISTICALLY TIED TOGETHER IN MANY CIVIC AND CULTURAL PROJECTS. GEORGE WASHINGTON'S BIRTHDAY IS BUT ONE SUCH MAGNIFICENT ANNUAL CELEBRATION TO WHICH MANY TEXAS AND MEXICAN OFFICIALS ARE INVITED TO ATTEND. TEXAS A&M INTERNATIONAL UNIVERSITY SERVES TO ADVANCE THE MUTUAL CULTURES OF THE TWO COUNTRIES. THREE BRIDGES CONNECT THE TWO CITIES WITH A FOURTH BRIDGE SCHEDULED FOR CONSTRUCTION.

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THE TWO CITIES ARE CONNECTED TO THE PORT OF CORPUS CHRISTI BY THE TEXAS-MEXICAN RAILWAY, 150 MILES IN LENGTH. THE SOLE PURPOSE OF THE TEXAS-MEXICAN RAILWAY IS TO SHIP FREIGHT BACK AND FORTH BETWEEN THE TWO LAREDOS AND THE PORT OF CORPUS CHRISTI. MUCH OF THE FREIGHT ORIGINATES FROM THE INTERIOR OF MEXICO AND THE RETURN FREIGHT FROM THE PORT OF CORPUS CHRISTI IS DESTINED FOR INTERIOR POINTS OF MEXICO.

IN THE OPINION OF MANY OBSERVERS, LAREDO IS PREDICTED TO BECOME THE MOST IMPORTANT NAFTA PORT OF ENTRY IN TEXAS. THE TWO CITIES, IN EFFECT, ARE TIED TOGETHER ECONOMICALLY BECAUSE OF THE LONG ESTABLISHED MAQUILADORA PROJECT WHICH ENABLED GOODS FROM THE UNITED STATES TO BE PROCESSED IN NUEVO LAREDO AND RETURNED AT A MINIMUM DUTY. NAFTA WILL EXPAND THIS ECONOMIC PARTNERSHIP.

LAREDO IS ALSO A PORT OF ENTRY TO A LARGE NUMBER OF US AND CANADIAN VISITORS TO MEXICO.

THE CURRENT NEWSWEEK MAGAZINE REPORTS THAT LAREDO "IS THE FASTEST GROWING CITY IN TEXAS." UNDOUBTEDLY, THIS IS STIMULATED BY THE INCREASED TRADE FROM MEXICO AND THE ENLARGED TONNAGE BEING SHIPPED TO THE PORT OF CORPUS CHRISTI. MOREOVER, FORBES MAGAZINE IN 1995 SAID, "THE TWO FASTEST GROWING CITIES IN THE COUNTRY ARE LAS VEGAS AND LAREDO, TEXAS."

THE KVTU NEWS DEPARTMENT GIVES COVERAGE OF MANY NUEVO LAREDO EVENTS; JOINT COMMUNITY PROJECTS OF THE TWO LAREDOS ARE BROADCAST ON A REGULAR BASIS. NUEVO LAREDO OFFICIALS ARE

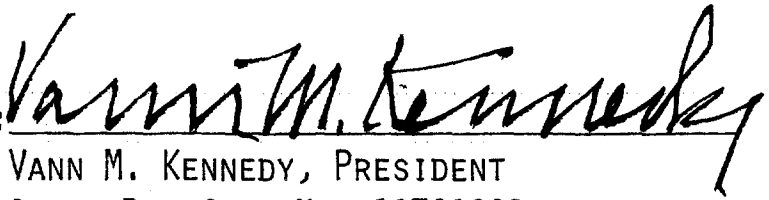
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FREQUENTLY INVITED TO APPEAR ON NEWS AND PUBLIC SERVICE PROGRAMS. KVTU CHANNEL 13 HAS RECEIVED PRAISE AND COMMENDATIONS FOR ITS SERVICE TO BOTH CITIES. THESE SERVICES WOULD BEST BE CONTINUED AT ATU CHANNEL 16 THAN THE PROPOSED CHANNEL 54.

WHEREFORE, ALL FACTORS CONSIDERED, THE APPLICANT REQUESTS THE ALLOCATION OF ATU 16.

RESPECTFULLY SUBMITTED:

K-SIX TELEVISION, INC. (KVTU CHANNEL 13)

By: 
VANN M. KENNEDY, PRESIDENT
STATE BAR CARD No. 11301000

VMK:VLM

ENCLOSURE: ENGINEERING STATEMENT

ENGINEERING STATEMENT

KVTV NTSC CH 13
ATV CH 16 Proposal

Laredo, Texas

Response to MM Docket No. 87-268
Comments on the Sixth Notice of Proposed Rulemaking

In the Matter of:

**"Advanced Television Systems and Their Impact Upon the
Existing Television Broadcast Service"**

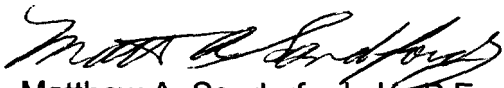
MARSAND, INC. is a consulting engineering firm, registered in the State of Texas, and has been retained by K-Six Television, Inc., Licensee of KVTV, Laredo, Texas for the purposes of filing a reply to the Comments of the Sixth NPRM in response to MM Docket No. 87-268.

On behalf of K-Six Television, Inc. this Engineering Statement is in support of a request to change the current Ch 54 ATV (Advanced Television), also referred to as DTV (Digital Television), assignment to ATV Ch 16.

In light of the Commission's intent to eventually cluster all of the broadcast television channels to 7 through 51, and the availability of a non-interfering Ch 16 opening under the Commission's criteria for interference separation of 150 km for co-channel separation, a Ch 16 ATV assignment is requested. A channel search was made for Ch 16 at the same coordinate location and found to be in compliance with the Commission's proposed separation rules. Under the requested assignment of Ch 16, the Licensee would be able to remain within the 7 through 51 channel cluster, without the undue burden of construction, costs, and identity created under the proposed Commission's assignment of Ch 54 and having to change once again after the NTSC-ATV overlap period is finished. We also note that Ch 16 was listed as an "other available channel" under the Broadcast Caucus listing dated 10-09-96.

The HAAT, ERP, and coordinate location would remain as originally proposed.

The Licensee requests that the Commission change the allocation for KVTV Ch 13 from ATV Ch 54 to ATV Ch 16.


Matthew A. Sanderford, Jr., P.E. 11-14-96
President, Marsand, Inc. - Consulting Engineer 817-246-8384

